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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ENVIRONMENTAL PROTECTION)
INFORMATION CENTER and)
AMERICAN LANDS ALLIANCE,)
Plaintiffs,)
v.)
UNITED STATES FOREST SERVICE,)
Defendant.)

Case No. C 02-2708 JCS

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO FILE
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
COSTS**

Plaintiffs intend to file a motion seeking attorneys fees and costs for the component of the case that arose after the merits phase of the case. Defendant expects that it would oppose such motion. In the interests of trying to resolve Plaintiffs' claim without the need for further litigation, the parties have agreed to engage in settlement discussions regarding Plaintiffs' attorneys fees and costs. Given the short turn around time provided in local rules 54-1(a) and 54-6(a) for costs and fees respectively, and given the ninety (90) day time frame provided under the Equal Access to Justice Act, 42 U.S.C. 2412(d)(1)(B), (d)(2)(G), the parties agree that an extension of time for the filing of Plaintiffs' motion for attorneys' fees and costs is appropriate. Therefore, counsel for Plaintiffs and Defendant request that this court extend the time for the filing of Plaintiffs' motion up to and including October 26, 2006.

Respectfully Submitted,

/s/
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[PROPOSED] ORDER

IT IS HEREBY ORDERED that the foregoing proposed extension of time for Plaintiffs to file a motion for attorneys' fees and costs until October 26, 2006 is granted.

Dated: August 9, 2006

